

Commonwealth of Massachusetts

MIDDLESEX Division

The Trial Court
Probate and Family Court Department

Docket No. 98D-4538-DV1

Complaint for ☒ Civil ☐ Criminal Contempt

MARLENE JOHANSEN, Plaintiff

v.

RALPH JOHANSON, Defendant

FILE

- 1) Plaintiff, who resides at 71 Pleasant Street, Stoneham, Middlesex County, MA 02180, was the spouse of defendant who now resides at 113 Saint Botolph Street, Boston, Suffolk County, MA 02115.
- 2) By Judgment of the Court dated December 24, 2001 defendant was ordered:
- ☐ to pay _____ in the sum of _____ forthwith and the further sum of _____ weekly thereafter
 - ☐ to grant plaintiff visitation rights with _____
 - ☐ not to impose any restraint on the personal liberty of plaintiff
 - ☐ to pay health insurance premiums for plaintiff and/or minor child(ren)
 - ☐ to pay reasonable medical and dental expenses
 - ☒ To bear sole responsibility for all the payment of taxes, interest and penalties assessed by the IRS and DOR for the tax years 1995-1998 (Federal) and 1993-1998 (State) and to indemnify Plaintiff for any liability arising out of these tax years. The Defendant was also ordered to secure a life insurance policy naming the Plaintiff as a beneficiary.
- and said Judgment is still in force.
- 3) Defendant has not obeyed that Judgment and:
- ☐ is in arrears of Court-ordered support payments
 - ☐ there now remains due and unpaid to plaintiff the sum of \$0.00 plus such further amounts as may accrue until the date of hearing
 - ☐ Plaintiff has been denied visitation rights on _____
 - ☒ has violated the Judgment Continually by Failing to resolve/pay the tax liability for said year. In addition, the Defendant has failed to indemnify and defend plaintiff from claims asserted against her by the IRS and DOR. In addition, the Defendant has failed to secure the required life insurance policy naming the Plaintiff as beneficiary.
- 4) Wherefore, plaintiff requests that defendant be required to appear before this Honorable Court to show cause why said defendant should not be adjudged in contempt of Court and for such other relief as said Court may deem just.

Date: August 26, 2004

Name:

MARLENE JOHANSEN
PRINT NAME

Address: 71 Pleasant Street

Stoneham, MA 02180

Tel. No. None